

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

DORMAN ANGEL, <u>et al.</u>,	::	CASE NO. C-1-01 467
Plaintiffs	::	(The Honorable Sandra Beckwith, Judge)
vs.	::	
PACE LOCAL 5-1967,	::	
and	::	
PAPER, ALLIED INDUSTRIAL,	::	
CHEMICAL & ENERGY WORKERS	::	
UNION, AFL-CIO,	::	
and	::	
INTERNATIONAL PAPER	::	
COMPANY	::	
and	::	
SMART PAPER, LLC,	::	
Defendants	::	
	:: :: :: :: ::	

**INITIAL DISCLOSURES OF PAPER, ALLIED
INDUSTRIAL, CHEMICAL & ENERGY WORKERS
UNION, AFL-CIO**

Defendant Paper, Allied Industrial, Chemical & Energy Workers Union, AFL-CIO

(PACE) hereby makes the following initial disclosures.

A. Persons With Discoverable Information

- 1. Ken Stanifer, PACE International Representative
1780 Sunset Drive, Hamilton, Ohio, 45013, phone: 513-863-6563

Has knowledge of negotiation and application of collective bargaining agreements and the effects bargaining package, Union meetings, and the international constitution.
2. Gerald Johnston, PACE Vice President and Regional Director
660 Northland Road, Suite 25, Cincinnati, Ohio, 45240,
Phone: 513-742-2095

Has knowledge of negotiation and application of collective bargaining agreements and the effects bargaining package, Union meetings, and the international constitution.
3. Tim Bray, PACE International Representative and former President of Local 5-1967

2998 Weeping Willow Drive, Hamilton, Ohio, phone: 513-726-4487

Has knowledge of collective bargaining agreements, the effects bargaining agreement, and union meetings.
4. Annetta Johnson, Milton Lewis, Tom Stewart, International Paper Officials

Have knowledge of the effects bargaining and agreement.

B. Documents

Collective bargaining agreements with Champion, International Paper, and Smart Paper; effects bargaining agreement with International Paper; international constitution and local union bylaws. Counsel has copies of these documents.

Respectfully submitted,

s/James B. Robinson

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CERTIFICATE OF SERVICE

I hereby certify that on the 21st day of November, 2003, a copy of the foregoing was filed electronically by operation of the Court's electronic filing system. and by regular U.S. Mail. Notice of this filing will be sent to Mark J. Byrne, Attorney for Plaintiffs, 2300 Kroger Building, 1014 Vine Street, Cincinnati, Ohio, 45202; Michael A. Roberts, Graydon, Head & Richey, P. O. Box 6464, Cincinnati, Ohio, 45210-6464 and Vincent J. Miraglia and W. Carter, Younger, McGuire Woods, 1050 Connecticut Avenue, N.W., Washington, D.C., 20036-5317, Attorneys for Defendant International Paper Company, Robert I. Doggett, , Attorney for PACE Local 5-1967, 215 E. Ninth Street, Sixth Floor, Cincinnati, Ohio, 45202; Laine S. Posel, Morgan, Lewis & Bockius, LLP, 1111 Pennsylvania Avenue, N.W, Washington, D.C., 20004, and Robert J. Hollingsworth, Cors & Bassett, LLC, 537 East Pete Rose Way, Suite 400, Cincinnati, Ohio, 45202, Attorneys for Defendant Smart Papers, LLC. Copies have also been sent to counsel by regular U.S. Mail. Parties may access this filing through the Court's system.

s/James B. Robinson

JAMES B. ROBINSON